

GOTLIB LAW

December 13, 2022

Via ECF & Email

The Honorable James L. Cott
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
(Email: CottNYSDChambers@nysd.uscourts.gov)

Re: United States v. Gumucio, et al. (Haven Soliman), 22 MAG 6904 (JEW)

Dear Judge Cott:

I represent Haven Soliman in the above-captioned matter pursuant to the Criminal Justice Act. I write, with the consent of the government and the U.S. Pretrial Services Office (“Pretrial”), to respectfully request that the terms of Ms. Soliman’s bond be temporarily modified to permit her to travel to Florida from January 17 through January 21, 2023.

Ms. Soliman appeared in the Western District of Washington, where she resides, on August 24, 2022. She was released on bond and an Order of Transfer to this District was entered the same day pursuant to Rule 5. Ms. Soliman appeared remotely in this District on August 31, 2022, before Magistrate Judge Willis, who so-ordered agreed-upon conditions of release, which include Ms. Soliman’s travel being limited to the Southern and Eastern Districts of New York, the Western District of Washington, the District of Oregon and points in between for travel to and from the permitted districts.

The requested temporary travel modification would allow Ms. Soliman to take her two minor children to see her parents in Florida. If permitted, Ms. Soliman would stay at her parents’ residence, the address to which I have provided to the government. To date, Ms. Soliman has been fully compliant with all the terms of her pretrial release. The government and Pretrial consent to this temporary modification to the terms of her pretrial release.

Accordingly, we respectfully request that the Court modify the terms of Ms. Soliman’s pretrial release to permit her to travel to Florida from January 17 through January 21, 2023. I thank the Court for its consideration.

Respectfully submitted,

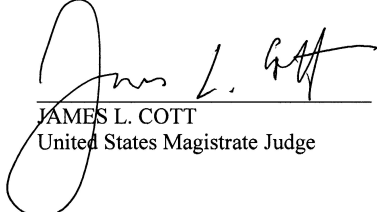
/s/

Valerie A. Gotlib

Dated: December 13, 2022
New York, New York

cc: Arraignment Clerks (via Email)
Michael Neff, Assistant U.S. Attorney (via Email)

Without objection from the Government, the request is granted. **SO ORDERED.**


JAMES L. COTT
United States Magistrate Judge